Charles W. Hingle, #1947 Shane P. Coleman, #3417 Jason S. Ritchie, #7442 HOLLAND & HART LLP 401 North 31st Street Suite 1500 P.O. Box 639 Billings, Montana 59103-0639 Telephone: (406) 252-2166

Fax: (406) 252-1669

Attorneys for Hyundai Motor Finance Co.

UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF MONTANA

INCREDIBLE AUTO SALES, LLC,) Bankruptcy No.06-60855-RBK
Debtor.	HMFC'S OBJECTION TO DEBTOR'S EMERGENCY MOTION TO ENTER ORDER APPROVING CASH COLLATERAL STIPULATION NOTICE OF HEARING
) Date: <u>December 12, 2006</u>) Time: 10:00 a.m.
	Time: 10:00 a.m. Location: Billings, Montana

Hyundai Motor Finance Company ("HMFC") hereby responds to Debtor's "Emergency Motion to Enter Order Approving Cash Collateral Stipulation." HMFC does not object to Debtor's alternative motion use of cash collateral for the purpose of making its payroll due today to its current employees, provided, however that Debtor submits a budget for such payments within five (5) days. The only budget that the Debtor has ever provided is its actual expenditures from last year. The amounts on Debtor's last year's budget do not reflect Debtor's current cash flow needs. Last year's salary budget is particularly inaccurate, because the Debtor has admitted

that it now operates on a skeletal staff, compared to previously years. HMFC and the other creditors in this case are entitled to know exactly how the cash is currently being spent on employee salaries and other expenses.

HMFC objects to the remainder of the Debtor's Motion. Particularly, HMFC denies the self-serving allegations that it has not cooperated with the other parties in connection with the cash collateral issue. HMFC has provided Debtor very modest comments and revisions on Debtor's revised draft Stipulation, but Debtor has provided no response at all to HMFC. Among other problems with Debtor's draft Stipulation is the Debtor's insistence that HMFC stipulate to an incorrect amount of the debt owed HMFC. Obviously, HMFC is not going to compromise its debt in this fashion. Except as noted above, Debtor's Motion should be denied.

DATED this 17th day of November, 2006.

/s/ Shane P. Coleman

FINANCE CO.

Charles W. Hingle, #1947 Shane P. Coleman, #3417 Jason S. Ritchie, #7442 HOLLAND & HART LLP 401 North 31st Street, Suite 1500 P.O. Box 639 Billings, Montana 59103-0639 ATTORNEYS FOR HYUNDAI MOTOR

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of November, 2006, I served a true and correct copy of the foregoing, addressed as follows and by the method shown below:

William L. Needler P.O. Box 177 Fuller Building Suite H 2 North Spruce Street Ogallala NE 69153 williamlneedler@aol.com	[] [X] []	U.S. Mail, postage prepaid Electronic service Overnight Delivery
Clarke B. Rice Clark B. Rice, P.C. 2951 King Avenue West Billings, MT 59102	[X] [] []	
Office of the U.S. Trustee U.S. Trustee's Office Liberty Center Suite 204 301 Central Avenue Great Falls MT 59401		U.S. Mail, postage prepaid Electronic service Overnight Delivery
Bruce F. Fain Murphy, Kirkpatrick & Fain, P.L.L.P. 208 North Broadway, Suite 208 P.O. Box 429 Billings, MT 59103-0429 bruce@murphkirk.com	[] [X] []	
Christopher P. Birkle Lovell Law Firm, P.C. 175 North 27th Street, Suite 1206 P.O. Box 1415 Billings, MT 59101 cbirkle@lovellaw.com		U.S. Mail, postage prepaid Electronic service Overnight Delivery
James A. Patten Suite 300, The Fratt Building 2817 2nd Avenue North Billings, MT 50101 japatten@ppbglaw.com	[] [X] []	U.S. Mail, postage prepaid Electronic service Overnight Delivery

Alan C. Bryan	[]	U.S. Mail, postage prepaid
490 North 31st Street, Suite 500	[X]	Electronic service
P.O. Box 2529	[]	Overnight Delivery
Billings, MT 59101		
abryan@crowleylaw.com		
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/s/ Shane P. Coleman

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